

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

RICHARD E. FREEMAN,)
on behalf of himself and)
all others similarly situated,)
)
PLAINTIFF,)
)
v.) Civil Action No. 3:10-CV-566
)
GC Services, LP, *et al.*,)
)
DEFENDANTS.)

MOTION TO STRIKE PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Defendants GC Services, LP, GC Financial Corporation and DLS Enterprises, Inc. (“collectively GC Services”), by counsel, state the following as their Motion To Strike Plaintiff Richard E. Freeman’s (“Freeman”) Motion For Class Certification. Further grounds supporting this Motion are set forth in GC Services’ Memorandum in Support of Motion to Strike Plaintiff’s Motion for Class Certification, filed contemporaneously herewith.

Dated: September 23, 2011

Respectfully submitted,

GC Services, LP

By: _____ /s/
Charles M. Sims, Esq. (VSB No. 35845)
John “Jack” M. Robb, III, Esq. (VSB No. 73365)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street, 8th Floor
Post Office Box 2499
Richmond, Virginia 23219
(804) 915-4138 Telephone
(804) 916-7238 Facsimile
charles.sims@leclairryan.com
jack.robb@leclairryan.com
*Counsel for Defendants GC Services, LP,
GC Financial Corporation and DLS Enterprises*

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of September, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jason M. Krumbein, Esq.
Krumbein Consumer Legal Services, Inc.
1650 Willow Lawn Drive, Suite 300
Richmond, Virginia 23230
Telephone: (804) 673-4358
Facsimile: (804) 673-4350
KrumbeinLaw@gmail.com

Owen Randolph Bragg
Horwitz Horwitz & Associates
25 E Washington St
Suite 900
Chicago, IL 60602
(312) 372-8822
Fax: (312) 372-1673
rand@horwitzlaw.com

Joelle Erica Gotwals
Law Office of Joelle Gotwals
P.O. Box 11133
Manassas, VA 20113-0133
571-377-8538
jgotwals@gmail.com
Counsel for Plaintiff Richard E. Freeman

/s/

John "Jack" M. Robb, III, Esq. (VSB No. 73365)
LECLAIRRYAN, A PROFESSIONAL CORPORATION
951 East Byrd Street, 8th Floor
Post Office Box 2499
Richmond, Virginia 23219
(804) 915-4138 Telephone
(804) 916-7238 Facsimile
jack.robb@leclairryan.com
*Counsel for Defendants GC Services, LP,
GC Financial Corporation and
DLS Enterprises, Inc.*